

**BEFORE THE**  
**PUBLIC SERVICE COMMISSION OF WISCONSIN**

INVESTIGATION OF AREA CODE RELIEF     )  
FOR THE 715 AND 920 AREA CODES         )  
IN WISCONSIN                                 )

Case Nos. 5-TN-100, 106

**COMMENTS OF ALLTEL COMMUNICATIONS. INC.**

Alltel Communications, Inc., (“Alltel Wireless”) hereby submit these comments in response to the Investigations conducted by the Wisconsin Public Service Commission (“Commission”) in the above referenced dockets. As explained in more detail below, Alltel Wireless urges the Commission to adopt an overlay plan for area code relief.

**DISCUSSION**

Alltel Wireless recognizes that the pending area code decisions are important and will impact all Wisconsin consumers. Therefore, it is critical that the pending area code relief process be as painless as possible for all Wisconsin consumers. As explained in more detail below, the overlay plan is the least disruptive and least expensive alternative. Timely introduction of a new area code will not only allow a smooth relief implementation process, it will also ensure that customers can continue to have access to telecommunications from their carrier of choice. Additionally, the overlay plan is the consensus choice of the telecommunications industry – as identified by Neustar letter to the Commission dated May 9, 2007.

As set forth in the Communications Act, as amended, Congress granted the FCC plenary authority over numbering within the United States.<sup>1</sup> The FCC delegated its authority over

<sup>1</sup> 47 U.S.C. 251(e)(1)

resolving matters involving the introduction of a new area code to the state commissions.

However, the state commission must “facilitate entry into the telecommunications marketplace” by making numbers available “on an efficient, timely basis.”<sup>2</sup> The Commission, therefore, must grant timely area code relief so that consumers can continue to base their choice of carrier on the one that best suits their needs and not based on whether or not the carrier has access to numbering resources.

In order to allow enough time to implement area code relief with a smooth transition, the Commission must act now. Area code relief cannot be done instantaneously as carriers need time to make necessary modifications to their network and consumers need adequate time to adjust to a new area code. In order to allow for an adequate implementation schedule and consumer education program, the Commission should act now to grant area code relief in the form the identified overlay plan.

The overlay plan, in contrast to a geographic area code split, will minimize the impact on consumers in the state of Wisconsin. The vast majority of jurisdictions that have implemented area code relief recently have chosen to use an all-services overlay. Among other things, an all-services overlay has the following advantages over other forms of area code relief:

- No consumers will be forced to change or “give back” their telephone number;
- No consumers will be required to endure the cost and inconvenience of changing stationary, business cards, and signage or contacting friends and colleagues about their changed telephone number;
- All consumers are treated equally, there is no “wrong side” of the split;
- Wireless consumers with phones that cannot be reprogrammed “over the air” (“non-OTA phones”) will not be required to manually reprogram their phones;

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<sup>2</sup> 47 C.F.R. 52.19(b)

- Carriers can implement an all-services overlay more quickly than a split;
- There is no “flash cut” with an overlay. Thus, new numbering resources are assigned as needed instead of forcing current customers on the “wrong side” of the split to change their number. Once implemented, overlays allow numbers to be available for use throughout the entire footprint of the old NPA, allowing resources to be used where future demand exists without the need to forecast demand, unlike with geographic splits.<sup>3</sup>

As this list delineates, there are many advantages to issuing an all-services overlay.<sup>4</sup> There are now nineteen (19) states (including Puerto Rico) that have adopted an overlay plan.<sup>5</sup>

In order to ease the transition to ten-digit dialing, the Commission should allow ample time for educating consumers in the state. To facilitate this transition the Commission should allow a period of at least six months for permissive dialing before mandatory 10-digit dialing would go into effect.

### CONCLUSION

Alltel Wireless strongly urges the Commission to grant an all-services overlay in a timely manner in order to allow sufficient time for carriers to make the necessary changes to their network and also to allow time to educate consumers on the change that will occur.

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<sup>3</sup> Split lines are recommended by Neustar based on its analysis of likely future demand patterns -- to ensure that the split areas are relatively balanced and have similar life expectancies after the split. Such analysis is not necessary with an overlay.

<sup>4</sup> The FCC has considered the relative advantages and disadvantages of geographic splits and overlays. See *Numbering Resource Optimization, Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200*, ¶¶ 62-70 (2000) (“Second NRO Order”). Among the disadvantages recognized by the FCC of geographic splits when compared to overlays are: (1) the fact that approximately half of the subscribers in the existing NPA must bear substantial costs associated with changing to a new NPA; (2) the difficulty of forecasting growth versus non-growth areas accurately, thereby increasing the likelihood of premature exhaust; and (3) splits can often create dialing confusion by requiring customers to use one dialing pattern for some calls (seven digits) and another dialing pattern for others (ten digits).

<sup>5</sup> The states that have implemented an all-services overlay include: Colorado, Florida, Georgia, Illinois, Massachusetts, Maryland, Michigan, Mississippi, North Carolina, New Jersey, New Mexico, New York, Ohio, Oregon, Pennsylvania, Puerto Rico, Texas and Virginia. Further, an all-services overlay will go into effect shortly in California.

Bill Ashburn

Vice President-State Affairs

300 North 44<sup>th</sup> Street, Suite 202

Lincoln, NE 68503

402.436.5932

[bill.ashburn@alltel.com](mailto:bill.ashburn@alltel.com)